

ATTACHMENT A

7:25mj107

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Tyler W. Fridley, Task Force Officer, United States Postal Inspection Service, having been duly sworn under oath, state as follows:

1. Your affiant is a certified police officer employed full time with the Virginia State Police and holds the rank of Special Agent. I am currently assigned as a Task Force Officer with the United States Postal Inspection Service (“USPIS”) assigned in the Roanoke, Virginia Domicile. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector. I have been employed as a sworn officer with the Virginia State Police since January 2010 and have worked in the drug interdiction arena with the Virginia State Police since 2018. My work has included highway drug interdiction and parcel interdiction at other commercial parcel businesses. I have received formal training in conducting criminal investigations into drug trafficking and money laundering organizations that utilize the United States Postal Service (“USPS”) and parcel courier services. During my tenure as a special agent, I have conducted and participated in numerous investigations of criminal activity that have violated both federal and state law.

2. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a

guarantee of delivery in one to three days.

Probable Cause

3. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9405 5301 0935 5155 8393 23” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Derek Ferguson, 2097 Pisgah Rd., Goode, VA 24556
- b. Return Address: Jesus Aragon, 1313 Sandra Dr., Bakersfield, CA 93304
- c. Postage Affixed: Origin: Bakersfield, CA 93304, Postage: \$9.30, Date: 05/27/2025
- d. Tracking Number: 9405 5301 0935 5155 8393 23 (Parcel #1)
- e. Description: White cardboard box bearing dimensions 8” x 5” x 1”
- f. Weight: 1 pound

4. On May 27, 2025, I identified Parcel # 1 during routine interdiction operations and took custody of Parcel #1. Parcel #1 was mailed from Bakersfield, California, a known source area for parcels containing controlled substances mailed into the Western District of Virginia. Parcel #1 is a white cardboard box bearing a printed USPS Priority Mail label. The return address is listed as Jesus Aragon, 1313 Sandra Dr., Bakersfield, CA 93304. The recipient is listed as Derek Ferguson, 2097 Pisgah Rd., Goode, VA, 24556. A photograph of Parcel #1 is attached as Exhibit #1.

5. I utilized CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone information, to conduct searches for information related to Parcel #1. A CLEAR search for the name of the sender “Jesus Aragon” is associated with the origination address 1313 Sandra Dr., Bakersfield, AZ 93304.

According to postal business records and CLEAR, the name of the addressee, “Derek Ferguson,” is associated to the destination address 2097 Pisgah Rd., Goode, Virginia 24556.

6. A search of postal business records revealed three (3) similar prior USPS Priority Mail parcels were mailed from the Los Angeles, CA metro area to the destination address of 2097 Pisgah Rd., Goode, VA 24556 from January 8, 2025, to March 18, 2025. Based on my training and experience, numerous parcels mailed from the Los Angeles, CA metro area to a specific address in the Western District of Virginia is an indication of drug trafficking through the U.S. Mail.

7. On May 27, 2025, I requested a narcotic detection canine from the Virginia State Police (VSP). Trooper Nicely, and his narcotic detection canine, “Mario,” responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a parcel line-up and subjected to an exterior search by Canine “Mario.” Trooper Nicely advised your affiant that Canine “Mario” positively alerted to Parcel #1 at approximately 11:20 a.m. According to Trooper Nicely, this positive alert meant Canine “Mario” detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Nicely and Canine “Mario” is provided as Exhibit #2.

8. Currently, Parcel #1 is located at the USPIS-Roanoke Domicile in the Western District of Virginia. The parcel has been maintained unopened, in my custody, pending application for a search warrant.

9. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail parcel bearing tracking number “9405 5301

0935 5155 8393 23,” addressed to “Derek Ferguson, 2097 Pisgah Rd, Goode, Virginia, 24556,” bearing a return address of “Jesus Aragon, 1313 Sandra Dr., Bakersfield, CA 93304,” contains controlled substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Tyler W. Fridley

Tyler W. Fridley
Task Force Officer
United States Postal Inspection Service

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 27th day of May 2025.



The Honorable C. Kailani Memmer
United States Magistrate Judge
Western District of Virginia